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GIRALDO ANGELO SULTANA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 14-251 EJD (HRL)
)	
Plaintiff,)	STIPULATION TO MODIFY
)	CONDITIONS OF PRETRIAL
vs.)	RELEASE; [PROPOSED] ORDER
)	
GIRALDO ANGELO SULTANA,)	
)	
Defendant.)	

Defendant GIRALDO ANGELO SULTANA ("Mr. Sultana") and the government, through their respective counsel, Assistant Federal Public Defender Robert Carlin, and Assistant United States Attorney Philip Kearney, stipulate and agree, subject to the Court's approval, to modify the defendant's previously set pretrial release conditions as follows:

On May 2, 2014, Mr. Sultana was released on a \$50,000 bond secured by his signature and that of his partner, who also posted property in the amount of the bond. His conditions of release require him to adhere to a curfew of 6:00 p.m. to 8:00 a.m.

The following curfew modifications are respectfully requested: (1) on November 18, 2014, Mr. Sultana's curfew may be extended to 11:00 p.m., to allow his attendance at a

1 presentation offered through Stanford University, which is to be hosted at the Sheraton Hotel in
 2 Palo Alto, California; (2) on November 23, 2014, Mr. Sultana's curfew may be extended to 1:00
 3 a.m. on November 24, 2014, as Mr. Sultana is scheduled to celebrate his twenty-seventh year of
 4 sobriety with his Alcoholics Anonymous group at 1000 Emeline, Building D, Santa Cruz,
 5 California, after which celebration the group will have dinner at a local restaurant; and (3) on
 6 December 6, 2014, Mr. Sultana's curfew may be extended to 11:00 p.m., to permit his
 7 attendance at his partner's (the surety in the instant matter) company holiday party, which is to
 8 be held at a restaurant named Piacere, 727 Laurel Street, San Carlos, California.

9 Counsel has consulted with Mr. Sultana's supervising United States Pretrial Services
 10 Officer Anthony Granados, and he has no objection to the proposed modifications.

11 Accordingly, the parties respectfully request that Mr. Sultana's pretrial release conditions
 12 be modified as requested, with all other conditions to remain in effect.

13 It is so stipulated.

14 Date: November 12, 2014

15 /S/
 ROBERT CARLIN
 Assistant Federal Public Defender

16 Date: November 12, 2014

17 /S/
 PHILIP KEARNEY
 Assistant United States Attorney

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 19
 20 **ORDER**

21 GOOD CAUSE APPEARING, pursuant to the stipulation of the parties, IT IS HEREBY
 22 ORDERED that for the above stated reasons the conditions of release previously set in this
 23 matter shall be modified thus: (1) on November 18, 2014, Mr. Sultana's curfew shall be
 24 extended to 11:00 p.m.; (2) on November 23, 2014, Mr. Sultana's curfew shall be extended to
 25 1:00 a.m.;

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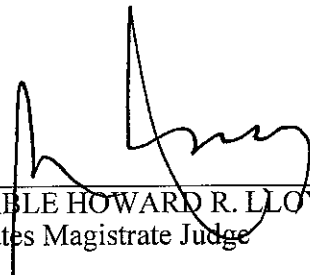
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2 (3) on December 6, 2014, Mr. Sultana's curfew shall be extended to 11:00 p.m. All other
3 conditions are to remain in effect.

4 IT IS SO ORDERED.

5 Dated:

11/13/14


HONORABLE HOWARD R. LLOYD
United States Magistrate Judge

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